



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

April 9, 2012

Nancy Weintraub
Senior Environmental Protection Specialist
Bonneville Power Administration
PO Box 3621, KEC-4
Portland, Oregon 97208-3621

Re: U.S. Environmental Protection Agency (EPA) comments on the Mid-Columbia Coho Restoration Program Final Environmental Impact Statement (FEIS) (EPA Project Number: 09-043-DOE).

Dear Ms. Weintraub:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the proposed Mid-Columbia Coho Restoration Program FEIS. The National Environmental Policy Act (NEPA) and Clean Air Act § 309 require the EPA to review and comment in writing on the environmental impacts associated with all major federal actions.

In our comments on the draft EIS in August 2011, the EPA indicated overall support for this project. We also identified a number of questions and concerns for consideration as the FEIS was developed. Of principal concern was the status of the Leavenworth National Fish Hatchery (LNFH) and its role within the Mid-Columbia Coho Restoration Plan (MCRP). We appreciate the thorough response given to our comments in the FEIS. In particular, we appreciate the revised water quality analysis (Section 3.5.3.1 and Appendix 13) and the inclusion of an approach to quantify the increase in total phosphorous (TP) from the proposed coho acclimation. Based on the analysis provided, we agree with BPA that it appears unlikely that the proposed acclimation program would increase hatchery loads enough to result in measureable changes in water quality conditions in Icicle Creek.

Also in reference to the LNFH, our comments raised concerns over the use of mixing zones in the water quality analysis because the draft 401 Certification issued by the Washington Department of Ecology did not authorize mixing zones for any parameters. The revised water quality analysis for LNFH addresses this issue by showing TP concentrations at the point of discharge. Further, because the NPDES permit for the LNFH is currently under review (and permit implications for coho rearing are as yet unknown); the FEIS appropriately includes a backup option to the use of the LNFH. This addresses our concern related to potential uncertainties around the permitting process.

Our comments on the DEIS also raised questions about the current and future status of the Mitchell Act hatcheries included in the proposed action. These comments were also thoroughly addressed in the FEIS. Section 2.2.2.1 directly addresses the issue of Mitchell Act funding and considers an alternate course of action should Mitchell Act funding for the Cascade and or Willard hatcheries be terminated.

The proposed approach will ensure that BPA's decision will not prejudice or preempt the decision of the National Marine Fisheries Service as they move toward finalizing the Mitchell Act EIS.

We also raised a question around the construction of the "No Action" alternative. In the DEIS, the No Action alternative was presented as a "no funding" alternative. Because defunding the program would result in changes to the program, we did not feel that it fulfilled the role of a "No Action" alternative per 40 CFR 1502.14(c). This issue was also adequately addressed in the FEIS. The "No Action" alternative has been appropriately revised to reflect a continuation of the current management strategy, the description of the alternative has been changed (Section 2.3), and the effects analysis has been appropriately revised.

Finally, we raised a question around the range of alternatives, and questioned the decision to analyze only one "action alternative" in the DEIS. Your response to our comment in the FEIS (Page A12-3) provides helpful background and context. Based on this explanation we concur that the proposed alternative has been through a robust review process, and that it has been vetted against multiple other alternatives in the course of the development of the Master Plan and the review processes that preceded the development of the EIS for the MCRP.

Thank you for the effort taken to address our concerns. We strongly support the overarching goal of restoring a locally adapted, self-sustaining, naturally spawning coho stock to the Wenatchee and Methow river basins, and we wish you success in your implementation of this project. If you have questions or would like to discuss the above comments, please contact me at (206) 553-1601 or by email at reichgott.christine@epa.gov, or you may contact Teresa Kubo of my staff at (503) 326-2859 or by email at kubo.teresa@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Reichgott". The signature is fluid and cursive, with the first name being the most prominent.

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit